

Docket 97-55
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WRITERS GUILD
WGAE AFL-CIO
OF AMERICA, EAST

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APR 8 1997

555 WEST 57TH STREET
NEW YORK, NY 10019
TEL 212-767-7800
FAX 212-582-1909

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April 8, 1997

Federal Communications Commission
1919 M Street
Washington, DC 20554

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Dear Commissioners:

I write on behalf of the members of the Writers Guild of America, East, who are writers for screen and entertainment television, and for other members who work as television and radio journalists (writers, producers, editors) at two of the three major television networks and at smaller news operations in this country. I wish to express their opposition to the establishment of a television ratings system by the Federal Communications Commission for use with or without the V-chip.

We urge you to reexamine the voluntary age-based labeling guidelines implemented by the broadcasting industry, which we believe meet the requirements of the Telecommunications Act of 1996. That system was designed to protect children from programming which is inappropriate for them — the central concern voiced by Congress as well as by proponents of a television ratings system. It advises parents of the appropriateness of content in terms of the age of their children by the use of symbols. The meanings of those symbols are easily accessible to parents and are sufficiently detailed to create the desired caution.

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To make those symbols reflect content in a less sophisticated way — identifying programs as containing unexplained and uncategorized violence, sex or language — is to fail to understand the extraordinary variation in the quality of programs. Such a system would ignore context and reduce dramatic and documentary television to an interchangeable mix of their most basic elements. It would willingly sacrifice quality for the false security of uniformity.

Among the proponents of a revised ratings system are those who would continually criticize any system, because their ultimate goal is a censorship so effective that it would remove from broadcast any programming which does not meet their social views and mores.

The by-product of censorship — the inevitable destruction of the good with the bad — was recognized by the Founding Fathers when they drafted the First Amendment with its clear, stark prohibitions against censorship by the government. Legal arguments regarding the questionable Constitutionality of such regulation by the F.C.C. will undoubtedly be made to you very skillfully by others.

As primary creators of television programming, however, we wish to draw your attention to the cultural and artistic cost of government censorship. Much has been made of the use by cable programmers of simplistic ratings that attempt to describe content homogeneously. In such a system the violence of "Schindler's List" is the same as the violence of an artless "shoot-em-up" exercise.

It is the addition of the V-chip which intensifies the damage by altering the economics of television. The damage will occur not so much in the labeling but in the inevitable economic effect which will result from such labeling. In the high stakes world of television, advertisers base choices on a single criterion — their capacity to reach the maximum number of targeted viewers with their message. If advertisers know that a number of television sets will not carry programs with a certain rating, they will, without question, avoid sponsoring that programming. Without sufficient advertising, the programs will be dropped.

Assuming the use of the V-Chip with such rating system is widespread, the proponents of censorship will have cause for celebration. Ultimately, they will remove much serious drama and concomitant serious discussion of a host of painful, important and adult issues from the most popular medium for communication in America.

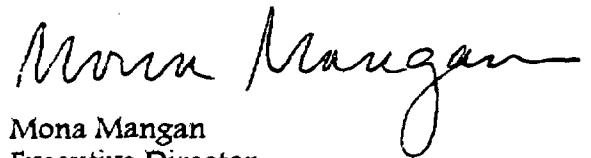
It is difficult to resist the strong appeal of anything which claims to protect children. The broadcasting industry has attempted to formulate a system which creates such protection. But to push further would impose a price in cultural and artistic freedom which would prove extraordinarily high for those very same children as they inherit their future in a free society.

Clearly, we must protect our children, but we must also protect our capacity for adult discourse and insure the viability of mature art

which examines themes which though less than attractive have importance in our society.

We urge you to recognize that the legal requirements of the Telecommunications Act have been met. To push into the realm of government censorship is to risk damaging the capacity of the F.C.C. to protect citizens and ultimately to affect the profound interest in free speech and open communications upon which this country is based.

Very truly yours,

A handwritten signature in cursive script, reading "Mona Mangan". The signature is fluid and extends to the right with a long horizontal stroke.

Mona Mangan
Executive Director